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November 7, 2019

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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COMMISSION

RE: Docket No. UE-190760; Carbon and Electricity Markets Stakeholder Work Group – Nomination and Comments by Invenergy LLC

Dear Mr. Johnson,

Invenergy LLC (“Invenergy”) appreciates the opportunity to respond to the Washington Utilities and Transportation Commission (“Commission”) Notice of Opportunity to Submit Nominations and File Written Comments (“Notice”) issued in Docket No. UE-190760 on October 28, 2019, regarding the Commission’s Carbon and Electricity Markets Stakeholder Work Group (“MWG”).

Pursuant to the Notice, Invenergy nominates Charles J. Black, Principal at CJB Energy Economics, to participate on the MWG. Mr. Black is a recognized expert on integrated resource planning, wholesale power markets, resource portfolio management, and energy and environmental policy issues. He has been an independent consultant since 2014, working on integrated resource planning, market valuations of power resources, assessments of distributed energy resources, and is co-producer for a continuing series of regional conferences on topics including wholesale power markets, power market design, greenhouse gas reduction, and electrification.

Mr. Black previously served as the Power Planning Division Director at the Northwest Power and Conservation Council and as Power Planning and Marketing Manager at Riverside (CA) Public Utilities. He prepared a study on dynamic pricing for the Commission in 2010 and provided training to Commission staff on wholesale power markets in 2017. Earlier in his career, Mr. Black was Assistant Power Manager at Tacoma Public Utilities, Puget Sound Energy’s first Director of Energy Risk Management, and led development of PSE’s 2004 Integrated Resource Plan. He received his Master of Arts Degree from the University of Washington and his combined Bachelor of Arts Degree in Mathematics and Economics from Western Washington University.

Invenergy also submits the following comments regarding proposed educational topics and initial examination of carbon and electricity markets. Invenergy supports beginning the MWG process with presentations on educational topics related to carbon and electricity markets. This can help establish shared understanding among the MWG members, the Commission and the Washington Department of Commerce (“Commerce”). It can also help define deliverables to be produced through the MWG process and organize its efforts.

1. A useful opening educational topic will be to identify and summarize key electricity and carbon markets-related elements of California's greenhouse gas reduction program, including how the California Air Resources Board cap-and-trade program and the California ISO electricity market operations work together to achieve carbon emissions reductions.
2. Another important initial topic will be a fact-based review of to what extent and how the Social Cost of Carbon (SCC) is currently reflected in incremental dispatching decisions for carbon-emitting power plants in the Western wholesale power markets, including bilateral and centrally organized markets. To the extent the SCC is not fully reflected in incremental dispatching decisions, describe why it is not and identify the resulting impacts on operation of the power markets and achievement of carbon emissions reductions.

Both topics listed above lend themselves to a panel format with speakers representing a broad range of expertise and responsibilities (e.g., vertically integrated utilities, nonutility generators, market and grid operators, environmental regulatory agencies, power and emissions traders, and market analysts).

Sincerely,/s/ Orijit Ghoshal

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